## THE LAW OFFICES OF SEAN M. MAHER, PLLC

May 13, 2020

## **VIA ECF**

Honorable Lorna G. Schofield United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 Application Granted. The Clerk of the Court is directed to terminate the letter motion at docket number 611

Dated: May 14, 2020 New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

RE: United States v. Mark Natanzon,

17 Cr. 262 (LGS)

Dear Judge Schofield:

I respectfully write to request that the Court appoint me under the Criminal Justice Act to represent Mr. Natanzon in seeking release from federal prison in light of the COVID-19 pandemic.

I previously represented Mr. Natanzon as CJA counsel before the Court in the above-referenced criminal case for which Mr. Natanzon currently is serving a 24-month sentence that was imposed on March 19, 2019. Mr. Natanzon is now 71 years old and suffers from coronary artery disease, hypertension, and diabetes. Prior to his sentencing, Mr. Natanzon underwent two heart stent surgeries. A request for release was submitted to the Warden of USP Lewisburg on April 6, 2020 and no answer has been provided to Mr. Natanzon.

Because I believe that Mr. Natanzon has a meritorious release motion to make to the Court and that he would benefit from the assistance of counsel in making such a motion, I respectfully request to be appointed to assist Mr. Natanzon.

The Court's consideration is greatly appreciated.

Respectfully submitted,

\_\_\_\_/S/ Sean M. Maher

cc: Opposing counsel via ECF